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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	2:13-cr-83-JCM-CWH
	)	
Plaintiff,	)	<b>GOVERNMENT'S RENEWED</b>
	)	<b>MOTION TO CONTINUE</b>
	)	<b>RESPONSE DEADLINE (Dkt.#203)</b>
LINDA MACK,	)	
	)	
Defendant.	)	
_____	)	

COMES NOW the United States of America, by and through DANIEL G. BOGDEN, United States Attorney, and Lisa C. Cartier Giroux, Assistant United States Attorney, hereby renews its motion to continue the deadline for the Government to file a response to Defendant Linda Mack's *Motion to Compel Pretrial Discovery* (Dkt.#203) for thirty (30) days.

The Government previously filed a motion to continue the response deadline (Dkt.#205). However, because of the pending trial date of March 21, 2016, the Magistrate could not grant the request. Instead the Magistrate gave the Government a brief extension in time to respond. (Dkt.#206). The Government then filed an emergency motion with the Court to continue the trial date and the response deadline. (Dkt.#208). The Government, however, did not provide the Court with actual dates of counsels' availability. Defense counsel for Reese, Keyster, and Mack also had previously filed a motion for a status conference stating that counsel for Defendants Reese

1 and Keyster had a conflict with the March 21, 2016 trial date, and that Defendant Mack did not  
2 object to a continuance of the trial date. (Dkt.#202). Similarly, defense counsel did not provide  
3 the Court with any dates on which the parties would be available to try the matter. As such, the  
4 Court denied the Government's motion as well as Defendants' motion. (Dkt.# 209).

5  
6 The parties have now filed a stipulation requesting that the current calendar call and trial  
7 dates be vacated. (Dkt.#210). The parties conferred and have provided the Court in that  
8 stipulation with dates during which all counsel will be available for trial.

9  
10 The Court indicated in its Order that if a proper stipulation was filed, that it would at that  
11 time, reconsider the Government's Motion to Continue the Response Date. (Dkt.# 209). The  
12 Government therefore respectfully requests that the Court grant it a thirty (30) day extension to  
13 the current deadline.

14  
15 Dated this 4<sup>th</sup> day of March 2016.

16  
17 Respectfully Submitted,

18 DANIEL G. BOGDEN  
19 United States Attorney

20 /s/Lisa C. Cartier Giroux  
21 LISA C. CARTIER GIROUX  
22 Assistant United States Attorney

23 **CERTIFICATE OF ELECTRONIC SERVICE**

24 This is to certify that the undersigned has served counsel for Defendants with the  
25 foregoing by means of electronic filing.

26 Dated this 4<sup>th</sup> day of March 2016.

27 /s/Lisa C. Cartier Giroux  
28 LISA C. CARTIER GIROUX  
Assistant United States Attorney

**ORDER**

**IT IS HEREBY ORDERED** that the Government shall have to and including April 4, 2016, within which to file its response to Defendant Mack's *Motion to Compel Pretrial Discovery*.

Dated this 9th day of March, 2016.

  
UNITED STATES MAGISTRATE JUDGE

Respectfully Submitted By:

/s/ Lisa C. Cartier Giroux

LISA C. CARTIER GIROUX  
Assistant United States Attorney